

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

**CROUSE HEALTH HOSPITAL, INC.,**  
736 Irving Ave  
Syracuse, NY 13210

*Plaintiff,*

v.

**UNITED STATES SMALL BUSINESS  
ADMINISTRATION**, 409 3rd St., SW,  
Washington, DC, 20416;

*and*

**ISABELLA CASILLAS GUZMAN**, *in her  
official capacity as Administrator*, U.S. Small  
Business Administration, 409 3rd St.,  
SW, Washington, DC, 20416

*Defendants.*

Civil Action No.: 5:23-CV-00615  
(BKS/ATB)

**Notice of Cross-Motion for Summary Judgment**

Defendants United States Small Business Administration (“SBA”) and Isabella Casillas Guzman, in her official capacity, (collectively, “Defendants”) hereby cross-move for summary judgment pursuant to Federal Rule of Civil Procedure 56, and respond in opposition to the motion for summary judgment filed by Plaintiff Crouse Health Hospital, Inc. (“Crouse”). Attached hereto and filed herewith in support of the motion are the following: (i) a combined memorandum in opposition to Crouse’s motion for summary judgment, and in support of Defendants’ cross-motion; (ii) the Declaration of Martin Andrews; (iii) Defendants’ Response to Crouse’s Statement of Material Facts Not in Dispute; and (iv) Defendants’ Statement of Material Facts Not in Dispute.

Pursuant to Local Rule 7.1, no appearances are required unless otherwise directed by the Court. Pursuant to the Court's Text Order dated October 30, 2024, Crouse's combined response/reply brief is due December 20, 2024, and Defendants' reply brief is due January 24, 2025. *See* Dkt. 70.

Dated: November 8, 2024

Respectfully submitted,

CARLA B. FREEDMAN  
United States Attorney

By: s/ Emer M. Stack  
Emer M. Stack  
Assistant United States Attorney  
Bar Roll No. 700843